

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	
Chad A. Russell,)	Case No. 17-24566-GLT
)	Chapter 13
Debtor)	Related to Docket No. 35
)	
)	Hearing Date and Time:
Ronda J. Winnecour, Chapter 13 Trustee,)	5/23/2018 at 11:00 AM
)	
Movant)	
)	
vs.)	
)	
Chad A. Russell,)	
)	
Respondent)	

RESPONSE TO TRUSTEE'S ORAL MOTION TO DISMISS

AND NOW, comes the debtor, Chad A. Russell, by and through his attorney,
Lauren M. Lamb and Steidl and Steinberg, and respectfully represents as follows:

1. This case was commenced on November 13, 2017 when the debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. A Conciliation Conference occurred on April 26, 2018. At this Conference, the Trustee asked that Debtor's case be dismissed for failure to make Plan payments.
3. Debtor has not yet made a Plan payment. However, Debtor intends on sending \$1,000.00 to the Trustee on May 18, 2018. Debtor's counsel has instructed him to forward proof of payment to her immediately.
4. Debtor has been unable to make payments thus far due to the fact that he is a self-employed contractor and his business is slow.

5. If the Trustee's Motion to Dismiss is withdrawn or denied, Debtor intends on amending his Chapter 13 Plan to provide for the surrender of the 2013 Saber camper and the 2014 Harley Davidson Streetglide motorcycle, which will reduce his Plan payment.

WHEREFORE, the debtor, Chad A. Russell, respectfully requests this Honorable Court deny the Trustee's Oral Motion to Dismiss.

Respectfully submitted,

May 17, 2018
DATE

/s/Lauren M. Lamb
Lauren M. Lamb, Esquire
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